

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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JORDAN RINDGEN,

Plaintiff,

-against-

BROOME COUNTY, BROOME COUNTY  
DISTRICT ATTORNEY'S OFFICE, FORMER  
BROOME COUNTY DISTRICT ATTORNEY  
MICHAEL A. KORCHAK, FORMER CHIEF  
ASSISTANT DISTRICT ATTORNEY MARK  
LOUGHREN, ASSISTANT DISTRICT ATTORNEY  
ALYSSA CONGDON, ASSISTANT DISTRICT  
ATTORNEY AMANDA CRONIN, DISTRICT  
ATTORNEY INVESTIGATOR JEFF J. WAGNER,  
UNIDENTIFIED JANE/JOHN DOE #1-10 BROOME  
COUNTY EMPLOYEES, CITY OF BINGHAMTON,  
POLICE CHIEF JOSEPH T. ZIKUSKI, CAPTAIN  
CORY MINOR, DETECTIVE AMANDA MILLER,  
UNIDENTIFIED JANE/JOHN DOE #1-10 CITY OF  
BINGHAMTON EMPLOYEES, HAILEY  
DEMKOVICH, and SAMANTHA HERCEG,

**NOTICE OF MOTION**

Case No. 3:24-CV-1325 (AJB/ML)

Defendants.

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PLEASE TAKE NOTICE that upon the enclosed Memorandum of Law, the undersigned, on behalf of defendant Alyssa Congdon (hereinafter "defendant"), shall move this Court upon submission of the papers before the Honorable Anthony J. Brindisi, U.S.D.J., for (a) an Order pursuant to Federal Rule of Civil Procedure § 12(b)(6) dismissing plaintiff Jordan Rindgen's complaint in its entirety; and (b) for such other and further relief in favor of defendant as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 7.1(a)(1) of the Local Rules of Practice of the United States District Court for the Northern District of New York, any papers to be submitted in opposition to the within motion must be filed with the Clerk of the Court and

served upon counsel for defendant no more than twenty-one (21) days after service of the motion, exclusive of that day.

DATED: January 13, 2025

Respectfully submitted,

HACKER MURPHY, LLP

Yours, etc.,

*/s James C. Knox*

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JAMES C. KNOX, ESQ.  
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To: **All Counsel Via ECF**